

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA**

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RYSTA LEONA SUSMAN, both individually  
and as Legal Guardian of SHANE ALLEN  
LOVELAND, et al.,

Case No. 8:18-cv-00127

Plaintiffs,

v.

**NOTICE OF DEPOSITION**

THE GOODYEAR TIRE & RUBBER  
COMPANY,

Defendant.

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**TO: Plaintiff, RYSTA LEONA SUSMAN, both individual and as Legal Guardian of  
SHANE ALLEN LOVELAND, and her attorneys of record, Kyle W. Farrar,  
William Ogden, Michael F. Coyle, Paul Godlewski, and Skip Lynch**

PLEASE TAKE NOTICE that Defendant, The Goodyear Tire & Rubber Company  
("Defendant") will take the depositions upon oral examination of the following:

1. John Doe A, identified as "Srv Writer AF" on the attached Kearney Towing & Repair Center Inc. Invoice #91571

Date: August 22, 2019

Time: 9:00 a.m.

2. John Doe B, identified as "Code/Tech BLS9" on the attached Kearney Towing & Repair Center Inc. Invoice #91571

Date: August 22, 2019

Time: 10:00 a.m.

The depositions will take place at the offices of Jacobsen Orr Lindstrom & Holbrook, P.C., L.L.O., 322 W. 39<sup>th</sup> Street, Kearney, Nebraska 68848 and will be taken before a person duly authorized to administer oaths and will continue from day to day until completed. You are invited to attend and exercise such rights to which you are entitled under the law.

Dated this 11<sup>th</sup> day of July, 2019.

THE GOODYEAR TIRE & RUBBER COMPANY,  
Defendant,

By: /s/Jennifer D. Tricker

Jennifer D. Tricker (NE# 23022)  
of BAIRD HOLM LLP  
1700 Farnam Street  
Suite 1500  
Omaha, NE 68102-2068  
Phone: 402-344-0500  
Email: jtricker@bairdholm.com

**CERTIFICATE OF SERVICE**

I hereby certify that on July 11, 2019, I served the foregoing by email to the following:

Kyle W. Farrar  
William Ogden  
KASTER, LYNCH, FARRAR & BALL, LLP  
1010 Lamar, Suite 1600  
Houston, TX 77002  
kyle@fbtrial.com  
bill@fbtrial.com

Paul E. Godlewski  
SCHWEBEL, GOETZ & SIEBEN, P.A.  
80 South 8th Center  
5120 IDS Center  
Minneapolis, MN 54402  
pgodlewski@schwebel.com

Michael F. Coyle  
FRASER, STRYKER LAW FIRM  
409 South 17th Street  
Suite 500, Energy Plaza  
Omaha, NE 68102  
mcoyle@fraserstryker.com

Skip E. Lynch  
Kaster, Lynch Law Firm – Florida  
125 N.E. First Avenue, Suite 3  
Oscala, FL 34470  
skip@thetirelawyers.com

Attorney for Plaintiffs

/s/Jennifer D. Tricker

Kearney Towing & Repair Center Inc  
1303 East 22nd Street  
Kearney NE 68847-5720  
308-236-9951  
TAX ID # 20-2127925

3/11/2019 9:37 AM

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Invoice #91571

DANDEE CONSTRUCTION  
P.O. BOX 2587  
305 E 8TH STREET  
KEARNEY NE 68847

Day Phone 237-4075 OFFICE  
Eve Phone 627-6660 CELL  
Fax Number 237-4070

-fold here -

Vehicle : 2003 Chevrolet Truck Silverado 1500 1/2 Ton 2WD -  
VIN : 1GCEC14X33Z115363  
Fleet # : 12  
Created : 6/10/2014 9:15:11 AM  
Complete : 6/10/2014 10:37:39 AM  
Invoiced : 6/10/2014 10:37:39 AM  
Contact : DAN'S CELL (627-6660)  
Srv Writer: AF

Tag/State : 9-2396 / NE

Odometer In : 185209  
Odometer Out : 185209

Qty	Code/Tech*	Reference	Description	Condition	Unit Price	Price
4	-	SCRAP2	SCRAP TIRE 13-17 INCH TIRE		\$3.50	\$14.00
	BLS9*	MOUNT1	MOUNT AND BALANCE TIRE			\$60.00
			PROVIDED OWN USED TIRES.			
			Labor			\$60.00
			Parts			\$0.00
			Sublet/Misc.			\$0.00
			Other Charges			\$2.40
			Charges			\$14.00
			Sales Tax		Tax @ \$2.40 * 7.0000%	\$0.17
			Total Due			\$76.57

Tech Certification #  
BLS9

The purchaser will be responsible for all collection costs if this invoice is not paid pursuant to it's terms and conditions. Payments are due within 30 days from the date of the invoice. Outstanding balances will accrue interest at a rate of 18% per annum. In addition, you are responsible for any additional collection agency fees (up to 30% of the outstanding balance) plus attorney fees should litigation become necessary to recover any unpaid balance.

Customer Signature \_\_\_\_\_

Exhibit A

EXHIBIT 7